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December 4, 1984

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VIA FEDERAL EXPRESS

Mr. John Cochran (6 AW-SE)
U. S. Environmental Protection Agency
1201 Elm Street
Dallas, Texas 75270

RE: South Cavalcade Street Site - Houston, Texas
(southeast of Cavalcade-Maury Street intersection)

Dear Mr. Cochran:

This letter is filed on behalf of our client, Merchants Fast Motor Lines, in response to the letter of October 22, 1984, from Allyn M. Davis, Director, Air and Water Management Division, EPA Region VI. This response is timely filed within the time extension until December 5, 1984, granted by Mr. Larry Wright.

Based upon a meeting of the current landowners and Koppers Company, the former owner of the "South Cavalcade Street site," held on November 28, 1984, and on a separate meeting of those parties with you on that same date, Merchants understands that Koppers is conducting its own site investigation work plan and intends to perform the RI/FS explained in the above-referenced EPA letter.

Based upon a review of the data made available to Merchants and upon those two meetings of November 28, Merchants presently believes that any pollutants or hazardous substances that may be present on the South Cavalcade Street site result from the creosoting and coal tar operations conducted by Koppers Co. on that site, prior to Merchants' purchase of its property. Therefore, Merchants does not believe that it should be considered to be responsible for the investigation of or cleanup of any hazardous substances or pollutants resulting from Koppers' former activities at the site.

Nevertheless, Merchants intends to cooperate fully with Koppers and the other current landowners and, thereby, with EPA in Koppers' RI/FS of the site.

Respectfully submitted

ANDREWS & KURTH

BY: Nancy W. Newkirk
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